

REMARKS

This paper is responsive to any paper(s) indicated above, and is responsive in any other manner indicated below.

CONCURRENT REQUEST FOR CONTINUED EXAMINATION (RCE)

Submitted concurrently herewith is a Request for Continued Examination (RCE) transmittal. In the event that the RCE transmittal is not filed herewith, then this paper should be taken as a request for the filing of an RCE.

RCE FILED TO AVOID PROSECUTION DELAYS

In view of the significant features/limitations of the amended and/or added claims being inappropriate (i.e., deniable) for entry after final rejection in that such would require significant further search and/or consideration, the present RCE was filed to avoid Advisory Action delay and to gain immediate entry/consideration of such feature/limitations. In view of the significant features/limitations of the amended and/or added claims, it is respectfully submitted that it would NOT BE PROPER to make a FIRST ACTION FINAL within the present RCE.

PENDING CLAIMS

Claims 1 and 4-14 were pending, under consideration and subjected to examination in the Office Action. Appropriate claims have been amended, canceled and/or added (without prejudice or disclaimer) in order to adjust a clarity and/or focus of Applicant's claimed invention. That is, such changes are unrelated to any prior art or scope adjustment and are simply refocused claims in which Applicant is present interested. At entry of this paper, Claims 1 and 4-26 will be pending for further consideration and examination in the application.

NON-REWRITTEN ALLOWABLE CLAIMS

Although claims 9, 11 and 13 have been indicated as being allowable if rewritten, as indicated within the "Allowable Subject Matter" section on page 5 of the Office Action, rewriting has not yet been effected as it is believed that any base and intervening claims will be allowed responsive to this paper. Applicant respectfully reserves the right to rewrite the potentially allowable claims at a later time if necessary, and Applicant and the undersigned respectfully thank the Examiner for such indication of potentially allowable subject matter.

REJECTION UNDER 35 USC '103

The 35 USC '103 rejection of claims 1, 4-8, 10, 12 and 14 as being unpatentable over Matsumoto et al. (U.S. Patent 5,796,428) in view of Sakai et al. (U.S. Patent 6,081,251) is respectfully traversed. However, such rejections have been rendered obsolete by the present clarifying amendments to Applicant's claims, and accordingly, traversal arguments are not appropriate at this time. However, Applicant respectfully submits the following to preclude renewal of any such rejections against Applicant's clarified claims.

All descriptions of Applicant's disclosed and claimed invention, and all descriptions and rebuttal arguments regarding the applied prior art, as previously submitted by Applicant in any form, are repeated and incorporated hereat by reference. Further, all Office Action statements regarding the prior art rejections are respectfully traversed. As additional arguments, Applicant respectfully submits the following.

Applicant's disclosed and claimed invention is directed to an improved arrangement which can be used to manage a large number of separately-stored still image files (or documents) arranged into a group (i.e., collection), while at the same time, allowing fast searches with respect to the group, and only requiring a small amount of memory resources to store group management information. More particularly, in the art, when a digital camera takes still pictures, individual still pictures are stored within separate computer files, and/or data of all the pictures may be accumulated and stored together within a common table or database. Applicant's

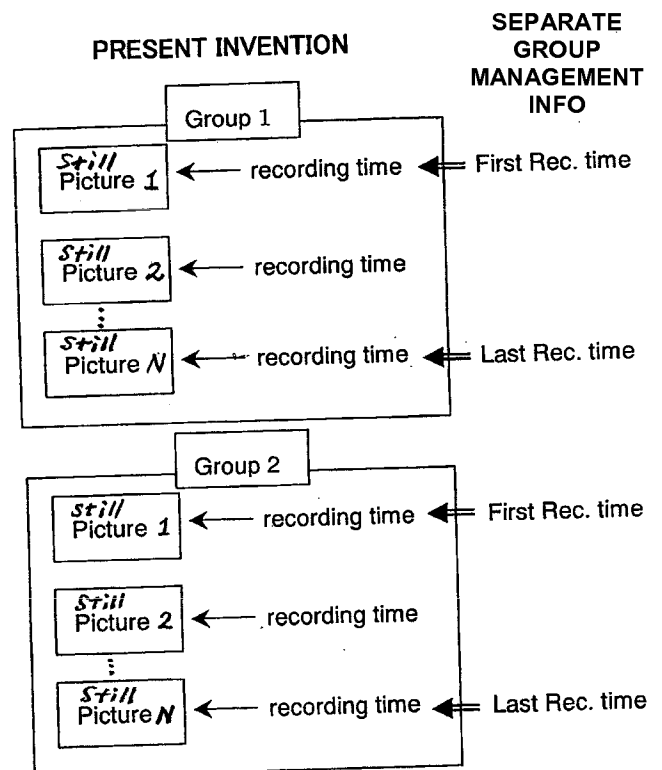
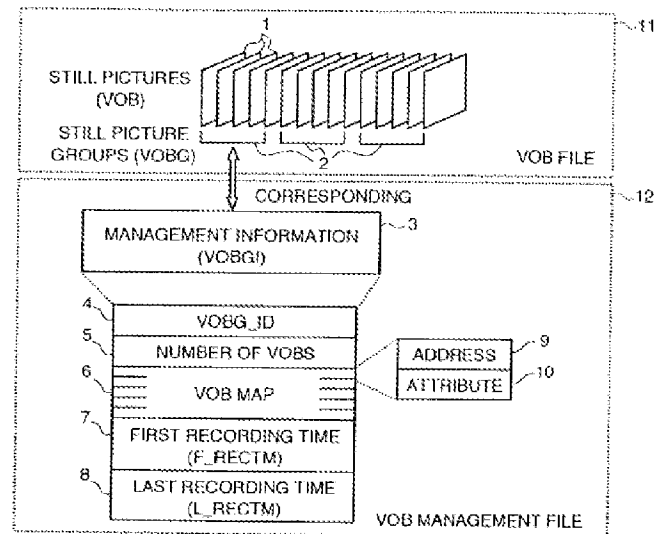
invention may be used to divide a plurality of separately-stored still image files into different **groups**, e.g., by forming a **new group for every 64 still pictures**. If a search for a picture based upon a picture's origination (i.e., production) time is performed with respect to the group, and if the search was required to compare against a start-time and/or end-time **for each picture**, whether by using the individual pictures or by using the common table or database (which stores data for **ALL pictures**), searching may be **onerous**, i.e., take a **long processing time** to perform the comparison with each picture's data, and a large memory would be required to store the start-time and/or end-time **for each picture**.

In order to allow quicker searching with respect to a group, and in order to afford the opportunity to reduce an amount of memory required for management information, Applicant's disclosed and claimed invention, using independent claim 1 as an example, includes an arrangement where "**said still picture group management information** has a data area for storing time data which specifies **time information including ONLY a first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device**, and **a last recording time at which the still picture data of a latest-photographed still picture in said still picture group was recorded last by the picture-taking device**". Such "still picture group management information" is "**provided SEPARATELY FROM any still picture management information** containing management information **for each still picture**".

FIG. 1

That is, if still picture management information containing management information is provided (see **VOB map 6** in Applicant's **FIG. 1**, reproduced herewith for convenience), Applicant's "still picture group management information" **7, 8** is provided **SEPARATE FROM** the still picture management information.

If two groups of still pictures were to be formed, a representation of such groups via **Applicant's invention** might be shown by the following sketch. Again, Applicant's invention can reduce an amount of memory required for group management information if the "first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device, and a last recording time at which the still picture data of a latest-photographed still picture in said still picture group was recorded last by the picture-taking device" is included, but the recording time for each individual picture is excluded.



In terms of **distinguishing features/limitations**, Applicant's independent claim 1 (taken as an example), recites: "A method for playing back a storage medium storing **still picture data of N still pictures stored in separate N files**, respectively, and **still picture group management information for managing said still picture data of said N still pictures as a still picture group**, where N is an integer number equal to or larger than one, wherein **said still picture group management information is provided SEPARATELY FROM any still picture management information containing management information for each still picture**, and said still picture group management information has a data area for storing time data which specifies **time information including ONLY a first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device**, and **a last recording time at which the still picture data of a latest-photographed still picture in said still picture group was recorded last by the picture-taking device**, said method comprising: receiving an entry of a predetermined time of interest regarding still pictures recorded by the picture-taking device; **comparing said predetermined time with said first and last recording times** stored in said still picture group management information; and selectively playing back the still picture data belonging to said still picture group **satisfying a condition in which said predetermined time is equal to or later than said first recording time and equal to or earlier than said last recording time.**"

Applicant's other independent claims have similar or analogous features/limitations.

Turning now to rebuttal of the Matsumoto et al. reference, it is respectfully submitted that Matsumoto et al. does disclose arrangements for grouping image data into "album groups", "page lists", "picture lists", etc. However, Office Action comments ADMIT that Matsumoto is deficient in that it fails to disclose the still picture group management information only storing the earliest and last recording times and updating either one of those if it needs [to be] updated.

Applicant respectfully agrees with such admission. More particularly, nowhere does Matsumoto et al.'s "album groups", "page lists" or "picture lists" include Applicant's claimed limitations, "wherein said still picture group management information is provided SEPARATELY FROM any still picture management information containing management information for each still picture, and said still picture group management information has a data area for storing time data which specifies time information including ONLY a first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device, and a last recording time at which the still picture data of a latest-photographed still picture in said still picture group was recorded last by the picture-taking device". In fact, Matsumoto's "album groups", "page lists" and "picture lists" appear NOT to contain any type of group management info provided separate from picture management info and having only a

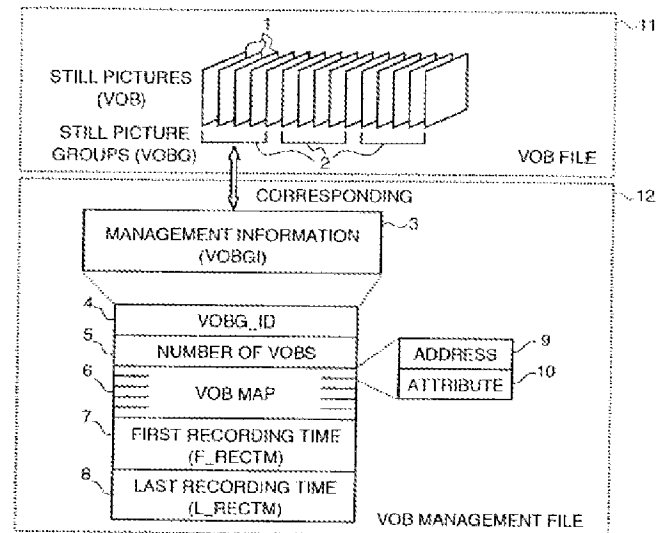
recording start/time time which are attributed to first/last pictures.

In an attempt to cure the major deficiency of Matsumoto, the Office Action rejection further cites **Sakai et al.**. However, is likewise deficient in that, Sakai et al. nowhere discloses or suggests any arrangement where “**said still picture group management information** has a data area for storing time data which specifies **time information including ONLY a first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device**, and **a last recording time at which the still picture data of a latest-photographed still picture in said still picture group was recorded last by the picture-taking device**”. Such “still picture group management information” is “**provided SEPARATELY FROM any still picture management information** containing management information **for each still picture**”. More particularly, Sakai et al. contains **NO DETAILS** as to exactly how its picture information and management information are stored. Accordingly, it is respectfully submitted that the most logical assumption would be that individual still pictures are stored within separate computer files, and/or data of **all** the pictures may be accumulated and stored together within a common table or database.

Again, as mentioned previously, Applicant teaches and claims an arrangement wherein if still picture management information containing management information for separate still picture computer files is provided (see **VOB map 6** in Applicant's **FIG. 1**, reproduced herewith for convenience), Applicant's "still picture group management information" **7, 8** providing **ONLY** the first recording time of the first picture in the group

and the last recording time of the last picture in the group, is provided **SEPARATE FROM** the still picture management information. Again, such is advantageous in that when one searches to see whether a picture (defined by a time) is included within a group, one can quickly access the "still picture group management information" **7, 8** providing **ONLY** the first recording time and the last recording time of boundary pictures in the group, and compare times to make such determination. In short, very little data is accessed and compared with Applicant's arrangement, in comparison to disadvantageous arrangements which access all data for all pictures as stored within a multitude of still picture files or within a table or database.

FIG. 1



No other previously-applied reference cures the major deficiencies mentioned above with respect to the above-discussed reference(s). Accordingly, it is respectfully submitted that the previously-applied references (whether taken individually, or in combination) would not have disclosed or suggested Applicant's claimed invention.

In addition to the foregoing, the following additional remarks from Applicant's foreign representative are also submitted in support of traversal of the rejection and patentability of Applicant's claims.

According to the description in column 10, line 53 to column 11, line 6 of Matsumoto et al ('428), when picture data each including the image and attribute data as shown in FIG. 10 are accumulated by a predetermined amount in the storage unit 104 of the image capturing unit 101 of FIG. 1, the image capturing unit 101 transfers the accumulated data to the image storage/display unit 102. The image storage/display unit 102 generates a file list 1301 as shown in FIG. 13 on the basis of the received picture data. The file list 1301 comprises a file header 1302 and a plurality of picture data 1001. The file header 1302 comprises a file number 1303, a total picture number 1304 corresponding to the number of pictures contained in the file list, date of the transfer such as year 1305, month 1306 and day 1307.

Applicant respectfully points out that the attribute data of Matsumoto et al does not include a first recording time and a last recording time of the still pictures in the still picture group, but include dates of transferring of the still picture data to the storage unit. Further, Matsumoto does not teach to provide, **in a separate data area**, a data

area for storing time data which specifies a first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device, and a last recording time at which the still picture data of a last-photographed still picture in said still picture group was recorded last by the picture-taking device.

Sakai et al teach to retrieve all of the stored still pictures using parameters of the still pictures to search a selected still picture. However, Sakai et al does not teach to use the first recording time and the last recording time of the still picture group, **as stored separately in a separate data area**, to search the selected still picture. Sakai et al also does not teach to provide such a separate data area for storing time data which specifies only a first recording time at which the still picture data of an earliest-photographed still picture in said still picture group was recorded first by a picture-taking device, and a last recording time at which the still picture data of a last-photographed still picture in said still picture group was recorded last by the picture-taking device.

As a result of all of the foregoing, it is respectfully submitted that the applied art (taken alone and in the Office Action combinations) would not support a '103 obviousness-type rejection of Applicant's claims. Accordingly, reconsideration and withdrawal of such '103 rejection, and express written allowance of all of the '103 rejected claims, are respectfully requested.

EXAMINER INVITED TO TELEPHONE

The Examiner is herein invited to telephone the undersigned attorneys at the local Washington, D.C. area telephone number of 703/312-6600 for discussing any Examiner's Amendments or other suggested actions for accelerating prosecution and moving the present application to allowance.

RESERVATION OF RIGHTS

It is respectfully submitted that any and all claim amendments and/or cancellations submitted within this paper and throughout prosecution of the present application are without prejudice or disclaimer. That is, any above statements, or any present amendment or cancellation of claims (all made without prejudice or disclaimer), should not be taken as an indication or admission that any objection/rejection was valid, or as a disclaimer of any scope or subject matter. Applicant respectfully reserves all rights to file subsequent related application(s) (including reissue applications) directed to any/all previously claimed limitations/features which have been subsequently amended or cancelled, or to any/all limitations/features not yet claimed, i.e., Applicant continues (indefinitely) to maintain no intention or desire to dedicate or surrender any limitations/features of subject matter of the present application to the public.

CONCLUSION

This Amendment is being submitted concurrently with the filing of a Request for Continued Examination (RCE) and does not present any changes which would require further search, consideration or fees. Entry and approval of the minor corrections made herein are respectfully requested.

To the extent necessary, Applicant petitions for an extension of time under 37 CFR '1.136. Authorization is herein given to charge any shortage in the fees, including extension of time fees and excess claim fees, to Deposit Account No. 01-2135 (Case No. 500.37453CX2) and please credit any excess fees to such deposit account.

Based upon all of the foregoing, allowance of all presently-pending claims is respectfully requested.

Respectfully submitted,

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